

UNCLASSIFIED

10. Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000ee-3)?

 X NO

 YES If yes, please describe the data mining function:

11. Is this a national security system (as determined by the SecD)?

 X NO

 YES

12. Status of System/ Project:

 X This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?

 NO [If no, proceed to next question (II.3).]

 YES If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):

 A conversion from paper-based records to an electronic system.

 A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

 A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

 A change that results in information in identifiable form being merged, centralized, or matched with other databases.

 A new method of authenticating the use of and access to information in identifiable form by members of the public.

 A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.

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_____ A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.

_____ A change that results in a new use or disclosure of information in identifiable form.

_____ A change that results in new items of information in identifiable form being added into the system/project.

_____ Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.

_____ Other [**Provide brief explanation**]:

3. Does a PIA for this system/project already exist?

_____ NO _____ YES

If yes:

a. **Provide date/title of the PIA:**

b. Has the system/project undergone any significant changes since the PIA?

_____ NO _____ YES

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1272295-0

Total Deleted Page(s) = 5

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(OGC/PCLU (Rev. 04/01/2011))

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [REDACTED]

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BIKR FBI Unique Asset ID: 2010-022-01-P-113-215-9999

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: IA [REDACTED]	Name: AGC [REDACTED]
Reason:	Program Office: HUMINT Validation	Phone: [REDACTED]
Declassify On:	Section	Room Number: 7350 JEH
	Division: Directorate of Intelligence	
	Phone: [REDACTED]	
	Room Number: PAT 3	

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FBI DIVISION INTERMEDIATE APPROVALS


	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: Directorate of Intelligence	Signature: [REDACTED] Date signed: 09/28/2011 Name: SSA [REDACTED] Title: Unit Chief, Cyber HUMINT Validation Unit	Signature: [REDACTED] Date signed: 10/4/2011 Name: [REDACTED] Title: Supervisory Mgt. & Program Analyst

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

<input type="checkbox"/> PIA is required by the E-Government Act. <input type="checkbox"/> PIA is to be completed as a matter of FBI/DOJ discretion. Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? <input type="checkbox"/> Yes. <input type="checkbox"/> No (indicate reason): <input checked="" type="checkbox"/> PIA is not required for the following reason(s): <input type="checkbox"/> System does not collect, maintain, or disseminate PII. <input type="checkbox"/> System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks). <input checked="" type="checkbox"/> Information in the system relates to internal government operations. <input type="checkbox"/> System has been previously assessed under an evaluation similar to a PIA. <input type="checkbox"/> No significant privacy issues (or privacy issues are unchanged). <input type="checkbox"/> Other (describe):	
Applicable SORN(s): <u>Employee Directory Systems for the Department of Justice, DOI-014, 74 Fed. Reg. 57194 (Nov. 4, 2009)</u> Notify FBI RMD/RIDS per MIOG 190.2.3? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd SORN/SORN revision(s) required? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes (indicate revisions needed):	
Prepare/revise/add Privacy Act (e)(3) statements for related forms? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes (indicate forms affected):	
RECORDS. The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates. Other:	
<div style="border: 1px solid black; width: 100px; height: 20px; margin-bottom: 5px;"></div> Unit Chief Privacy and Civil Liberties Unit	Signature: <div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div> Date Signed: 01/21/11
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature:  Date Signed: 10/12/11

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NAME OF SYSTEM / PROJECT:

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: (a) name of the system/project, including associated acronyms; (b) structure of the system/project, including interconnections with other projects or systems; (c) purpose of the system/project; (d) nature of the information in the system/project and how it will be used; (e) who will have access to the information in the system/project; (f) and the manner of transmission to all users.

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NAME OF SYSTEM / PROJECT:

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2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?

_____ NO [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

X YES [If yes, please continue.]

3. Please indicate if any of the following characteristics apply to the information in the system about individuals: Bear in mind that log-on information may identify or be linkable to an individual.
(Check all that apply.)

X The information directly identifies specific individuals.

X The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.

X The information can be used to distinguish or trace an individual's identity (i.e., it is linked or linkable to specific individuals).

If you marked any of the above, proceed to Question 4.

_____ None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly.

4. Does the system/project pertain only to government employees, contractors, or consultants?

_____ NO X YES

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NAME OF SYSTEM / PROJECT:

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5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

_____ NO. [If no, skip to question 7.]

 X YES. [If yes, proceed to the next question.]

6. Does the system/project collect any information directly from the person who is the subject of the information?

 X NO [If no, proceed to question 7.]

_____ YES

a. Does the system/project support criminal, CT, or FCI investigations or assessments?

_____ NO

_____ YES [If yes, proceed to question 7.]

b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)?

_____ NO [The program will need to work with PCLU to develop/implement the necessary form(s).]

_____ YES Identify any forms, paper or electronic, used to request such information from the information subject:

7. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project? Full SSNs should only be used as identifiers in limited instances.

 X NO _____ YES If yes, check all that apply:

_____ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.

_____ SSNs are necessary to identify FBI personnel in this internal administrative system.

NAME OF SYSTEM / PROJECT:

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_____ SSNs are important for other reasons. Describe:

_____ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe:

_____ It is not feasible for the system/project to provide special protection to SSNs. Explain:

8. Is the system operated by a contractor?

 X No.

_____ Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation contains standard contract clauses that must be included in the event the system collects, maintains or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the Office of the General Counsel may be required if a contractor is operating the system for the FBI.

9. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

_____ NO If no, indicate reason; if C&A is pending, provide anticipated completion date:

 X YES If yes, please indicate the following, if known:

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Confidentiality: ___Low___Moderate X High ___Undefined

Integrity: ___Low___Moderate X High ___Undefined

Availability: ___Low___Moderate X High ___Undefined

_____ Not applicable -- this system is only paper-based.

NAME OF SYSTEM / PROJECT: b7D
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10. Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000ee-3)?

 X NO YES If yes, please describe the data mining function:

11. Is this a national security system (as determined by the SecD)?

 X NO YES

12. Status of System/ Project:

 X This is a new system/ project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?

 NO [If no, proceed to next question (II.3).]

 YES If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):

 A conversion from paper-based records to an electronic system.

 A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

 A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

 A change that results in information in identifiable form being merged, centralized, or matched with other databases.

 A new method of authenticating the use of and access to information in identifiable form by members of the public.

NAME OF SYSTEM / PROJECT: b7C
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_____ A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.

_____ A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.

_____ A change that results in a new use or disclosure of information in identifiable form.

_____ A change that results in new items of information in identifiable form being added into the system/project.

_____ Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.

_____ Other (Provide brief explanation):

3. Does a PIA for this system/project already exist?

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

b. Has the system/project undergone any significant changes since the PIA?

_____ NO _____ YES

[The PIA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

(OGC/PCLU (Rev. 04/01/2011))

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Virtual Reality Tactical Training Simulator (VIRTSIM)

BIKR FBI Unique Asset ID: _____

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: MPA [REDACTED] Program Office: PAU Division: Training Phone: [REDACTED] Room Number: JTTF-1	FBI OGC/PCLU POC Name: [REDACTED] Phone: [REDACTED] Room Number: 7350 JEH

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Training [insert division name]	Signature: [REDACTED] Date signed: 9/29/2012 Name: [REDACTED] Title: Unit Chief	Signature: [REDACTED] Date signed: 9/29/2012 Name: [REDACTED] Title: Unit Chief
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

_____ PIA is to be completed as a matter of FBI/DOJ discretion.

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? _____ Yes. _____ No (indicate reason):

☒ PIA is not required for the following reason(s):

☒ System does not collect, maintain, or disseminate PII.

_____ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

_____ Information in the system relates to internal government operations.

_____ System has been previously assessed under an evaluation similar to a PIA.

_____ No significant privacy issues (or privacy issues are unchanged).

_____ Other (describe):

Applicable SORN(s): _____


Notify FBI RMD/RIDS per MIOG 190.2.3? _____ No _____ Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

SORN/SORN revision(s) required? _____ No _____ Yes (indicate revisions needed):

Prepare/revise/add Privacy Act (e)(3) statements for related forms? _____ No _____ Yes (indicate forms affected):

RECORDS. The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates.

Other:

<div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div> Unit Chief	Signature: <div style="border: 1px solid black; width: 250px; height: 20px; display: inline-block;"></div>	Date Signed: 4/26/12
Privacy and Civil Liberties Unit	Signature: 	Date Signed: 4/30/12
James J. Landon, Deputy General Counsel		
FBI Privacy and Civil Liberties Officer		

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: (a) name of the system/project, including associated acronyms; (b) structure of the system/project, including interconnections with other projects or systems; (c) purpose of the system/project; (d) nature of the information in the system/project and how it will be used; (e) who will have access to the information in the system/project; (f) and the manner of transmission to all users.

The Virtual Reality Tactical Training Simulator (VIRTSIM) is a product developed for the FBI. It is a three-dimensional technical simulator that employs wireless and motion capture technology to create a virtual 3-D environment. It will be used for the tactical training of FBI New Agent Trainees.

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2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?

☒ NO [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

☐ YES [If yes, please continue.]

3. Please indicate if any of the following characteristics apply to the information in the system about individuals: Bear in mind that log-on information may identify or be linkable to an individual.

(Check all that apply.)

_____ The information directly identifies specific individuals.

_____ The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.

_____ The information can be used to distinguish or trace an individual's identity (i.e., it is linked or linkable to specific individuals).

If you marked any of the above, proceed to Question 4.

_____ None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly. **[If you checked this item, STOP here after providing the requested description.]**

4. Does the system/project pertain only to government employees, contractors, or consultants?

_____ NO _____ YES

5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

_____ NO. **[If no, skip to question 7.]**

_____ YES. **[If yes, proceed to the next question.]** Only name can be retrieved.
Do not collect any other information.

6. Does the system/project collect any information directly from the person who is the subject of the information?

_____ NO **[If no, proceed to question 7.]**

_____ YES

a. Does the system/project support criminal, CT, or FCI investigations or assessments?

_____ NO

_____ YES **[If yes, proceed to question 7.]**

b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)?

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9. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

_____ NO If no, indicate reason; if C&A is pending, provide anticipated completion date:

_____ YES If yes, please indicate the following, if known:

Provide date of last C&A certification/re-certification:

Confidentiality: ___Low___Moderate___High___Undefined

Integrity: ___Low___Moderate___High___Undefined

Availability: ___Low___Moderate___High___Undefined

_____ Not applicable -- this system is only paper-based.

10. Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000cc-3)?

_____ NO

_____ YES If yes, please describe the data mining function:

11. Is this a national security system (as determined by the SecD)?

_____ NO

_____ YES

12. Status of System/ Project:

_____ This is a new system/ project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?

_____ NO [If no, proceed to next question (II.3).]

_____ YES If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):

_____ A conversion from paper-based records to an electronic system.

_____ A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

_____ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

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_____ A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.

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_____ A change that results in a new use or disclosure of information in identifiable form.

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_____ Other [Provide brief explanation]:

3. Does a PIA for this system/project already exist?

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

b. Has the system/project undergone any significant changes since the PIA?

___ NO ___ YES

[The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]